

PRUDENT EXHBIT 4

THE HONORABLE MARY JO HESTON

Witness: 30(b)(6) PHH
Exhibit 4
8/12/2020
Christina Atencio, CSR

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

In re

SARAH HOOVER,

Debtor.

SARAH HOOVER,

Plaintiff,

vs.

QUALITY LOAN SERVICE CORPORATION
OF WASHINGTON, PHH MORTGAGE
CORPORATION D/B/A PHH MORTGAGE
SERVICES, HSBC BANK USA, N.A., AS
TRUSTEE OF THE FIELDSTONE
MORTGAGE INVESTMENT TRUST,
SERIES 2006-2, NEWREZ, LLC, AND IH6
PROPERTY WASHINGTON, L.P. D/B/A
INVITATION HOMES

Defendants.

Chapter 13

Case No.: 19-42890-MJH

Adversary No.: 20-04002-MJH

PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO DEFENDANT
PHH **WITH RESPONSES THERETO**

TO: Sarah Hoover c/o Christina L. Henry

AND TO: Counsel of record

PLAINTIFF'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION TO DEFENDANT PHH **WITH**
RESPONSES THERETO

CASE No. 20-04002-MJH

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HOUSER LLP
600 University St., Ste. 1708
Seattle, WA 98101
PH: (206) 596-7838
FAX: (206) 596-7839

1 PHH agrees to produce all non-privileged documents within its possession.

2 PHH reserves the right to supplement this response.

3 REQUEST FOR PRODUCTION NO. 15: Produce all documented Communications
4 PHH had with Sarah Hoover's attorney regarding Mr. Ali Suleiman's Account.

5 RESPONSE: PHH incorporates its answers and objections contained in its responses to
6 Request for Production No. 1-14. Notwithstanding and without waiving the general objections
7 above, PHH responds as follows:

8 PHH agrees to produce all non-privileged documents within its possession.

9 PHH reserves the right to supplement this response.

10 REQUEST FOR PRODUCTION NO. 16: Produce all documented Communications
11 PHH had with any other agent for Sarah Hoover regarding the Mr. Ali Suleiman's Account.

12 RESPONSE: PHH incorporates its answers and objections contained in its responses to
13 Request for Production No. 1-15. Notwithstanding and without waiving the general objections
14 above, PHH responds as follows:

15 PHH agrees to produce all non-privileged documents within its possession.

16 PHH reserves the right to supplement this response.

17 REQUEST FOR PRODUCTION NO. 17: Produce all documented Communications
18 PHH had with any other agent for Sarah Hoover regarding her bankruptcy filing.

19 OBJECTION: PHH objects to the term "bankruptcy filing" as vague, undefined and
20 overly broad.

21 RESPONSE: PHH incorporates its answers and objections contained in its responses to
22 Request for Production No. 1-16. Notwithstanding and without waiving the general objections
23 above, PHH responds as follows:

1 PHH agrees to produce all non-privileged documents within its possession.

2 PHH reserves the right to supplement this response.

3 REQUEST FOR PRODUCTION NO. 18: Produce all documented Communications
4 PHH had with any other agent for Sarah Hoover regarding her bankruptcy filing.

5 OBJECTION: PHH objects to the term “bankruptcy filing” as vague, undefined and
6 overly broad.

7 RESPONSE: See Response to Request No. 17.

8 REQUEST FOR PRODUCTION NO. 19: Produce any and all documented
9 Communications PHH had with IH6 regarding the Property.

10 RESPONSE: PHH incorporates its answers and objections contained in its responses to
11 Request for Production No. 1-18. As stated in PHH’s response to Interrogatory No. 13, prior to
12 this lawsuit, PHH is not aware of any communications it had with IH6 regarding the Account or
13 Property.

14 PHH reserves the right to supplement this response.

15 REQUEST FOR PRODUCTION NO. 20: Produce any and all documented
16 Communications PHH had with QLS after learning about Sarah Hoover’s bankruptcy filing.

17 OBJECTION: PHH objects to the term “bankruptcy filing” as vague, undefined and
18 overly broad.

19 RESPONSE: PHH incorporates its answers and objections contained in its responses to
20 Request for Production No. 1-19.

21 PHH agrees to produce all non-privileged documents within its possession.

22 PHH reserves the right to supplement this response.

1 Dated: June 29, 2020.

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3 **HOUSER LLP**

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5 By: s/ Ryan S. Moore

6 Ryan S. Moore (WSBA 50098)

7 rmoore@houser-law.com

8 Robert W. Norman, Jr. (WSBA 37094)

9 bnorman@houser-law.com

10 Attorneys for Defendants PHH Mortgage
11 Corporation d/b/a PHH Mortgage
12 Services, HSBC Bank USA, N.A., as
13 Trustee of the Fieldstone Mortgage
14 Investment Trust, Series 2006-2 and
15 NewRez, LLC
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VERIFICATION

I, Sony Prudent, am a Senior Loan Analyst employed by Ocwen Financial Corporation whose wholly owned subsidiary is PHH Mortgage Corporation, acting as attorney-in-fact for HSBC Bank USA, N.A., as Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2. I have read the foregoing Responses to Plaintiff's First Interrogatories and Requests for Production to PHH in the above-referenced action and I certify under penalty of perjury, under the laws of the United States of America, that the foregoing statements are true and correct.

DATED this 30th day of June, 2020 at Margate, FL.


Signature

Printed Name Sony Prudent
Sr. Loan Analyst

Title _____